

IN RE:	:	
MICHAEL GIBBS	:	CASE NO. 1:19-bk-04690-HWV
RECHINDA PALMER-GIBBS	:	
Debtors	:	CHAPTER 13
	:	
PNC BANK, NATIONAL ASSOCIATION	:	
Movant	:	
	:	
v.	:	
	:	
MICHAEL GIBBS	:	
RECHINDA PALMER-GIBBS	:	
Respondents	:	

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded.
5. Admitted.
6. Admitted in part and denied in part. Debtors have recently made two (2) payments of \$1,209.00 each by cashier's check at the bank. Debtors request a six (6) month Stipulation to resolve the remainder of the arrearage.
7. Admitted in part and denied in part. See response to paragraph 6.

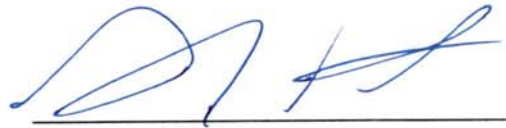
8. Denied. Debtors are providing adequate protection through regular monthly payments. Further, the real estate is worth \$200,000.00 in accordance with the market analysis filed with Debtors' Schedules. Movant holds a first mortgage on the property. The amount owed to Movant at the time of filing was \$106,294.70 (see Claim 19). Accordingly, there is an abundance of equity providing adequate protection to the Movant.

9. Admitted in part and denied in part. Said amount is only owed if Movant proves that Debtors were in arrears at the time of the filing of the Motion for Relief. Further, Strict proof is demanded as to the amount of the fees and costs.

10. Admitted in part and denied in part. Any and all fees and costs related to this Motion should be determined in conjunction with the resolution of this Motion for Relief.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: 10-10-24

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF PNC BANK, NATIONAL ASSOCIATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

BRENT J. LEMON, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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For Debtors

DATED: 10/10/2024